

TOWN OF BRATTLEBORO

1. **Application Identification:** Town of Brattleboro
230 Main Street
Brattleboro, VT 05301
2. **Funding Requested:**
 - a. **Assessment Grant Type:** Community-wide
 - b. **Federal Funds Requested:**
 1. \$200,000
 2. No waiver is requested because this is a community-wide assessment
 - c. **Contamination:** Hazardous Substances
3. **Location:**
 - a. Brattleboro
 - b. Windham County
 - c. Vermont
4. **Property Information for Site Specific Proposal:** This is not a site-specific proposal.
5. **Contacts:**
 - a. Project Director: Susan Fillion, Planning Director
Town of Brattleboro
230 Main Street, Suite 202
Brattleboro, VT 05301-2878
Phone: 802-251-8112, Fax: 802-254-6456
Email: sfillion@brattleboro.org
 - b. Chief Executive: Peter Elwell, Town Manager
Town of Brattleboro
230 Main Street, Suite 202
Brattleboro, VT 05301-2878
Phone: 802-251-8102, Fax: 802-257-2322
Email: pelwell@brattleboro.org
6. **Population:** The Town of Brattleboro's population is 11,487 (Population estimates, July 1, 2017, U.S. Census Bureau, Population Estimates Program)
7. **Other Factors Checklist:** Other factors do not apply.
8. **Letter from the State Environmental Authority:** Please see Attachment A for a letter from the Vermont Department of Environmental Conservation acknowledging that the Town of Brattleboro is applying for hazard substance funding for a community-wide assessment program,

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i Background and Description of Target Area

Brattleboro, Vermont is in Windham County in southeastern Vermont. With a 2017 population of 11,487, Brattleboro is the largest town in Windham County and serves as the commercial and industrial center.¹

Brattleboro has a rich industrial heritage reaching back to water-powered mills and manufacturing industries including printing presses, organ manufacturing, and textiles. The town was impacted by long-term changes in transportation and production technology in the second half of the twentieth century along with shifting economic patterns leading to a global economy. Deindustrialization has resulted in many vacant or underutilized buildings and contaminated sites limiting their safe reuse. Other twentieth century land uses such as loosely regulated dry cleaning shops contribute to the total number of sites.

Large-scale economic changes have concentrated poverty in Brattleboro. Census tract 9685 has median family income below 80% of the statewide median family income and is thus eligible for New Market Tax Credits (NMTC). NMTC is a federal program designed to spur new investment in operating businesses or real estate projects in a community where high rates of poverty and unemployment are present. This census tract includes downtown Brattleboro, the central business district. **We will we will target our activity in Census Tract 9685 to obtain the most possible leverage for new projects.**

1.a.ii Description of the Priority Brownfield Site(s)

There are approximately 68 hazardous substance brownfield sites totaling 135 acres within the target area. This estimate was based on known vacant or underutilized industrial land. The most prevalent contaminants found in Brattleboro have been solvents, petroleum products, PAHs, PCBs, arsenic, lead, metals, VOCs, and asbestos. All are potential public health threats to a densely developed area with commercial, industrial, and residential uses adjacent to many sites.

The priority site for assessment is 47 Flat Street, known as the Sanel Building, and the adjacent parking lot, totaling approximately 0.50 acres. The building has 14,556 square feet of vacant commercial space. The building dates to the 1890's and was built on a property where a furniture manufacturer had machine, varnish and paint shops. Historical uses of the building include a furniture shop, wholesale grocery, and an auto-supply parts store. The property poses a potential health risk due to the historical use of the property. In addition, this site is in proximity to sites known to be contaminated from solvents, petroleum products, PAHs, PCBs, arsenic, lead, metals, VOCs, and asbestos. All of these are potential public health threats in this densely developed area with commercial, industrial, and residential uses adjacent. The site is also an environmental risk due to its proximity to the Whetstone Brook, which is located less than 200 feet away.

This property has been vacant since 2012. It has been for sale over the years. There has been recent activity to recruit the world headquarters of a local manufacturing plan to this site.

¹ Population estimates, July 1, 2017, U.S. Census Bureau, Population Estimates Program

i.b. Revitalization of the Target Area

i.b.i *Revitalization Strategy and Alignment with Revitalization Plan*

The redevelopment strategy for the priority site is to redevelop this property as a mixed-use building with a pocket park providing much needed green space in the downtown. The building will have commercial use on the ground floor with offices on the upper floors. This aligns with and advances the following land use plans:

- Brattleboro Town Plan: The Town Plan documents a vision the future that provides for mixed-use development, complete streets, and avoiding sprawl by concentrating development in the existing core.²
- Vermont Downtown Action Team Report: The State of Vermont funded a Downtown Action Team to assist downtown Brattleboro with strategies to increase resiliency in the wake of flooding from Tropical Storm Irene in 2011. The redevelopment will further the Flat Street Infill Development project that was identified in the report.³
- Design for Resilience on the Lower Whetstone Brook: This plan identified a series of designs and strategies to reduce stormwater runoff, increase flood storage, provide infill development opportunities, and create visual and physical access to the Whetstone brook.
- Vermont Statutory Planning Goals: The dense, compact development in the targeted area will take advantage of infrastructure that already exists, including water, sewer, and sidewalks. The redevelopment of brownfield sites in the targeted area will use existing resources, consistent with Vermont Planning goals.
- Southeastern Vermont Comprehensive Economic Development Strategy (CEDS): The CEDs, approved by the US Economic Development Administration in 2014, has a goal of increasing the number of good paying jobs in the healthcare, technology and manufacturing, and green building sectors.

i.b.ii *Outcomes and Benefits of Redevelopment Strategy*

The funded assessment activities will promote economic benefits for Brattleboro. From creating jobs to increasing the tax base, the funding provided can be the catalyst to jump-start a major redevelopment project. Funding for site assessments helps remove one financial barrier to developers interested in a brownfield site.

Redevelopment of the priority site will bring jobs to the downtown and create a park in the in an area that is densely developed and where residents to not have a lot of access to open space. The jobs will create a multiplier effect whereby these workers spend some money at the downtown stores and restaurants, further boosting the local economy. The park will improve stormwater management in a part of town with known stormwater deficiencies.

i.c Strategy for Leveraging Resources

i.c.i *Resources Needed for Site Reuse*

The Town can leverage EPA Brownfield Assessment funding with other funding in order to maximize the potential of all redevelopment efforts. We will work with the property owner to redevelop the priority site and assist them with obtaining funding and/or technical assistance through Vermont and Federal Tax Credits (New Market, Historic, Affordable Housing, etc.), Community Development Block Grant, Vermont Economic Development Authority, Vermont

² Brattleboro Town Plan, Adopted May 15, 2018, page 122.

³ Vermont Downtown Action Team Report for Brattleboro, VT, August 1, 2014, page 56.

Community Loan Fund, and Vermont Community Foundation.

If cleanup funding is required, the Windham Regional Commission's Brownfields Revolving Loan Fund (RLF) and US EPA Cleanup grants are potential sources of funding. The RLF currently has grant and loan funds available for projects of this nature.

i.c.ii Use of Existing Infrastructure

Thoughtful redevelopment over the past decade has preserved the traditional built form in the targeted area. There is municipal water and sewer available with the capacity to serve redeveloped properties and infill development. The priority site is in the downtown. There is an existing street and sidewalk network and it is adjacent to the Transportation Center that provide parking for the downtown. The Department of Public Works is currently studying what can be done to improve stormwater capacity and will be moving forward with a three-phase plan to improve it in the coming years. These improvements will be funded through a combination of municipal taxpayer dollars and state grants.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a Community Need

2.a.i The Community's Need for Funding

The Town of Brattleboro lacks the financial resources to fund assessment activities. Key factors that limit the Town's ability to fund such work include:

- Compared to Windham County, the State of Vermont, and the United States, Brattleboro has a higher rate of residents living in poverty, lower per-capita income, and lower household income.⁴
- Brattleboro's population limits local market growth which means little or no growth in the commercial and residential tax base. Real estate taxes paid on residential property account for approximately 86% of all property taxes. There is no ability to fund additional services without raising additional revenue (taxes).
- Brattleboro's property taxes are currently seventh highest in the State of Vermont.⁵ There is no county government in Vermont and there is no countywide tax base.
- Infrastructure and utilities are in constant need of maintenance and, in some cases, replacement to meet new regulatory standards. The Town recently completed a \$32 million upgrade to the Wastewater Treatment Plant to comply with federal and state regulations. A \$14.1 bond was authorized to undertake a project to improve two fire stations and the police station. Both bonds are still being paid down.

2.a.ii Threats to Sensitive Populations

(1) Health or Welfare

Sensitive populations are at risk from brownfields sites in the targeted area. This grant will address the health and welfare of children, pregnant women, and the elderly by reducing exposure to toxins of concern. The target area is an area of older homes. Approximately 67% of

⁴ US Census Bureau, Quick Facts: Brattleboro Town, Windham County, Vermont

⁵Vermont Department of Taxes, Division of Property Valuation and Review. *2018 Effective Total Estimated for Homestead Properties*
https://tax.vermont.gov/sites/tax/files/documents/AnnualRpt_TotalTaxRates_HS_AscSort_2018.pdf

housing units in the targeted area were built before 1950.⁶ Lead levels in perimeter soils at pre-1950 Vermont homes commonly test at two to nearly four times EPA cleanup levels for play areas.⁷ Brattleboro also is known to have poor air quality days where temperature inversions which traps pollutants from vehicles, fireplaces, and industry that are emitted into the air and result in poor air quality.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions
Health effects are cumulative, and this grant will address greater than normal incidence of conditions that could be environmentally related by reducing surface exposure to toxins. Windham County has higher than statewide levels of elevated juvenile lead blood concentrations and lower than average levels of first trimester pregnancy prenatal care.⁸ The prevalence of asthma in Vermont has been significantly higher than that of the U.S. since 2007.⁹ The 2011-2012 Brattleboro Health District estimated that 9% of adults were diagnosed with asthma (compared to the Center for Disease Control's 2012 estimate of 8% of adults in the US). Based on a Community Health Needs Assessment, Brattleboro Memorial Hospital set a goal to improve the health indicators of the community with a focus on diabetes and obesity.¹⁰

(3) Economically Impoverished/Disproportionately Impacted Populations
This grant will help improve the quality of life in neighborhoods by redeveloping blighted properties, producing local job opportunities, and reducing exposure to toxins. There is a high poverty rate in the target area. According to the US Census, 15.2% of the population in the targeted area live below the poverty level. Vandalism, drug abuse and dealing, and assaults have all been documented in the targeted area. This area is exposed to a higher than average inventory of toxic waste sites including all the brownfield sites. This is illustrated in the following table:

Table: Hazardous/Brownfield site per capita

	Brattleboro CDP ¹¹	Windham County	Vermont
Population ¹²	7,414	42,869	626,200
Hazardous Site per 1000 residents ¹³	11.9	9.9	7.4
Brownfield Sites per 1,000 residents	2.4	0.8	0.2
Potential Brownfield sites per 1,000 residents ¹⁴	11.9	7.8	Not available

⁶ 2013-2017 American Community Survey 5-year estimates, DP04 Selected Housing Characteristics.

⁷ Vermont Office of the Attorney General and Department of Health. *Get the Lead Out Vermont*. 2007.

⁸ Vermont Department of Health. "Health Status Report 2008." 2008. Vermont Department of Health. (latest report)

⁹ Vermont Department of Health Data Explorer, 2016 data for Childhood Lead Poisoning.

¹⁰ Brattleboro Memorial Hospital, Grace Cottage Hospital, Brattleboro Retreat. *Community Health Needs Assessment of Windham County, VT*. (2012).

<http://gmcboard.vermont.gov/sites/gmcboard/files/BMH%20CHNA%20Report.pdf>

¹¹ Brownfield and hazardous sites data are not available at the census tract level. The target area (Census Tract 9685 lies primarily with the Brattleboro CDP so that was the best geography to use for data comparison purposes.

¹² Population data are most recent available on census.gov/quickfacts as of January 2019

¹³ Data on hazardous sites and brownfield sites from the Vermont Department of Environmental Conservation

¹⁴ Information on potential brownfield sites in Brattleboro and Windham County from the Windham Regional Commission

2.b Community Engagement

2.b.i Community Involvement

The following is a list of project partners who will assist with the assessment program:

Partner Name	Point of Contact	Specific role in the project
Brattleboro Area Chamber of Commerce	Kate O'Connor	<ul style="list-style-type: none">• Distribute brochures• Assistance with public outreach
Brattleboro Development Credit Corporation	Adam Grinold	<ul style="list-style-type: none">• Identify potential sites• Participate in cleanup planning• Refer property owners/developers• Provide financial advice
Downtown Brattleboro Alliance	Stephanie Bonin	<ul style="list-style-type: none">• Participate in reuse planning• Distribute community outreach material through list serve
Connecticut River Conservancy	Kathy Urffer	<ul style="list-style-type: none">• Participate in cleanup/reuse planning• Provide technical assistance

2.b.ii Incorporating Community Input

Community input is critical to the success of the program. We will incorporate community input in the following ways:

- Steering Committee: The Brattleboro Planning Commission (PC) will serve as a steering committee for the grant and will be tasked with accepting sites into the program. The PC is a seven-member volunteer board appointed by the Selectboard. The PC is currently comprised of a broad range of citizens including a certified planner, artist, and small business owner. Other roles for the Steering Committee will include: identify stakeholder and groups for participation, serve as liaisons to the community, and participate in reuse visioning when necessary.
- Community Visioning: We will engage the community in reuse visioning with sites that need additional work. We will intentionally target community members to participate with this project so that they can benefit from the decisions that will shape their neighborhood. We will identify a wide range of stakeholders with interests in community health and wellness, affordable housing, economic development, and neighborhood improvement to protect a wide variety of interests.
- Public Meetings: Public meetings will be held at key points during the assessment process. These meetings will be held at locations and times convenient to the community and will allow for a direct exchange of information between interested citizens, project staff, and environmental professionals. English is the predominant language spoken in Brattleboro.¹⁵ As the program becomes aware of situations where language or interpreter assistance is necessary, we will secure translation services so that all community members can be involved.

We will use a combination of newspapers, television, print materials, and social media to communicate our progress. All community input will be documented to maintain continuity in project decision-making. Information documents related to project activities will be accessible

¹⁵ According to the US Census Bureau, 2013-2017 American Community Survey, 96.13% of people in the targeted area speak only English.

to the public during Town Office business hours. The Town will maintain a copy of all reports in both digital and hard copy. In accordance with Vermont's Open Meeting Law, all minutes of meetings where brownfields are discussed will be available to the public and posted on the Town's website. Community participation activities will also be documented.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a Description of Tasks and Activities

The Town of Brattleboro is applying for funds for the Brattleboro Brownfields Program (BBP).

The overall goal of the BBP is to return sites with real or perceived contamination to the market or to reuse for the public good. Funding for the BBP will be used **primarily for environmental site assessment, reuse and cleanup planning for hazardous sites.**

The following are the tasks and activities for the program:

1. Cooperative Agreement Management-These activities will take place beginning at award and will continue through the end of the grant.
 - a. Project Management: Project Manager will oversee assessment services for the duration of the work (quarterly reporting, ACRES data entry, annual financial and DBE reporting, etc.)
 - b. Qualified Environmental Professional Selection: The project manager will conduct competitive procurement to obtain a Qualified Environmental Professional to conduct assessment and remediation planning. This activity will take place following funding release
 - c. Brownfields Conference/Trainings: Project manager will attend the 2019 Brownfields Conference and the biannual meetings that the Vermont DEC Brownfields Program holds.
 - d. State Cleanup Program: Project manager will work with sites to enroll them in the State of Vermont's Brownfields Reuse and Environmental Liability Limitation Program (BRELLA)
2. Community Outreach and Engagement-These activities will take place beginning upon award and will continue through the end of the cooperative agreement.
 - a. Steering Committee – The Project Manager will meet with the Steering Committee as needed (a minimum of bi-monthly) to facilitate community input and accept new sites into the program.
 - b. Community Meetings – The project manager will hold a minimum of 3 public meetings to present assessment findings and address public concerns
 - c. Project Status Updates- The project manager will regularly update the Town's website and issue press releases at notable project milestones.
 - d. Brownfields Transaction Forum: The project manager will hold a workshop for professionals involved in land transactions
3. Site-Specific Activities - These activities will take place following funding release and continue through the end of the cooperative agreement:
 - a. Phase I Environmental Site Assessments: The Qualified Environmental Professional will conduct Phase I ESA throughout the duration of the cooperative agreement.

- b. Phase II Environmental Site Assessments: The Qualified Environmental Professional will conduct Phase II ESAs throughout the duration of the cooperative agreement.
 - c. Coordination and Oversight: The Town Project Manager will oversee the work of the Qualified Environmental Professional and coordinate with VT Department of Environmental Conservation, US EPA, and qualified environmental professional.
4. Reuse and Cleanup Planning - These activities will commence during year 2 and continue through the end of the cooperative agreement:
 - a. Community Outreach: The project manager and steering committee will conduct outreach for all sites that enter remediation planning.
 - b. Evaluation of Corrective Actions/Corrective Action Plan: The Qualified Environmental Professional will conduct remediation planning in accordance with state and federal guidelines on up to three sites.
 - c. Area-wide Planning: The project manager, steering committee and a consultant will identify potential future uses, develop strategies to facilitate reuse of existing infrastructure, and identify potential infrastructure improvements.

3.b Cost Estimates and Outputs

Budget Categories	Task 1: Cooperative Agreement Oversight	Task 2: Community Outreach and Engagement	Task 3: Site Assessment Activities	Task 4: Reuse and Cleanup Planning	TOTAL
Personnel	\$6,974	\$2,789	\$2,789	\$2,790	\$15,342
Fringe Benefits	\$3,036	\$1,214	\$1,214	\$1,212	\$6,676
Travel	\$2,500				\$2,500
Equipment					
Supplies		\$482			\$482
Contractual			\$129,000	\$46,000	\$175,000
Other (specify)					
Total Direct Cost	\$12,510	\$4,485	\$133,003	\$50,002	\$200,000
Indirect Costs					
Total Budget	\$12,510	\$4,485	\$133,003	\$50,002	\$200,000

Task 1 – Cooperative Agreement Oversight

- *Personnel Costs* - 200 hours (20 hours for Steering Committee meetings, 30 hours for community meetings, 20 hours for project updates, and 20 hours for transaction forum) at average rate of \$34.87 per hour
- *Fringe Benefits* - 200 hours at average rate of \$15.18 per hour
- *Travel*- \$2,000 for one person to attend the National Brownfields Conference (air travel, lodging, conference registration, and per diem); \$500 for attendance at EPA-sponsored regional trainings (car travel and per diem)

Outputs: Hire qualified environmental professionals, submit 5 eligibility determinations to the US EPA, attend the National Brownfields Conference. update EPA Acres database, submit 12 quarterly reports, 6 MBE/WBE Utilization reports, a final report, and other required reports

Task 2 – Community Outreach and Engagement

- *Personnel Costs* - 80 hours (20 hours for Steering Committee meetings, 30 hours for community meetings, 20 hours for project updates, and 20 hours for transaction forum) at average rate of \$34.87 per hour
- *Fringe Benefits* - 80 hours at average rate of \$15.18 per hour
- *Supplies* - \$482 estimated for direct mailings, printing of large-scale maps, and brochures for the Transactional Forum

Outputs: 18 Steering Committee meetings, 5 project updates, a minimum of 3 public meetings to discuss assessment findings and address public concerns, 1 Brownfields Transaction Forum

Task 3 – Site Assessment Activities

- *Personnel Costs* - 80 hours (review reports and coordinate with EPA, VT DEC, and property owners and prospective purchasers) at average rate of \$34.87 per hour
- *Fringe Benefits* - 80 hours at average rate of \$15.18 per hour
- *Contractual Costs*- 5 Phase I ESAs at a cost of approximately \$3,250 each¹⁶, 4 Phase II HS ESAs at \$28,000 each, totaling \$110,000¹⁷

Outputs: 5 Phase I assessment reports, 4 Phase II assessment reports,

Task 4 - Reuse and Cleanup Planning

- *Personnel Costs* - 80 hours (20 hours for community outreach, 30 hours to review and coordinate reuse planning documents with EPA and VT DEC, and 30 areas for area-wide planning) at average rate of \$34.87 per hour
- *Fringe Benefits* - 80 hours at average rate of \$15.18 per hour
- *Contractual Costs*- reuse and cleanup planning on up to 3 sites at an average cost of \$12,000¹⁸ per site, hire consultant at \$10,000) for area-wide plan

Outputs: Reuse and cleanup planning to 3 sites, 3 public meetings, 1 Area-wide Plan

3.c Measuring Environmental Results

The Town of Brattleboro will track, measure, and evaluate progress of the work. This measurement will include updating the ACRES system as work is completed and results can be reported. The Town will also complete other required EPA reports including the MBE/WBE Utilization Report and the annual Federal Financial Report. Progress will be monitored by the Project Manager and the Town's Grant Manager. If work appears to be deviating from schedule, the Project Manager will work with the EPA Project Manager to strategize ways to keep making progress on the work plan.

¹⁶ Cost is based on average costs of Phase I assessment. Cost may be less depending on size of site.

¹⁷ Based on Town of Brattleboro previous experience, the cost of Phase II assessment depends on the size and former use. Prices vary from \$15,000 to \$40,000 for an initial Phase II investigation. Petroleum sites tend to be more expensive, therefore the higher estimate. Phase II ESAs will include a Quality Assurance Project Plan (QAPP).

¹⁸ Based on the average Corrective Action Plan costs as reported by the local regional planning commission.

4. PROGRAMMATIC CAPABILITY AND PERFORMANCE

4.a Programmatic Capability

4.a.i *Organizational Structure*

The Town of Brattleboro has the organizational capacity to manage this grant and ensure that the project is completed on time. All grants are assigned a separate account number and expenditures and revenues are tracked separately. Each year Brattleboro is audited in accordance with generally accepted auditing standards, issued by the Comptroller General of the US and the provisions of Office of Management and Budget Circular A-133, "Audits of States, Local Governments and Non-Profit Organizations."

Susan Fillion, Director of the Planning Services Department, will serve as project manager and oversee the program. She will perform staff responsibilities, manage the work of the QEPs, oversee the assessment funds and programmatic requirements, and will also serve as the liaison between the Town and state officials and the EPA. Ms. Fillion is a planner with 17 years of experience in community planning who spent 10 years either assisting or managing EPA-funded brownfields assessment programs. In the unlikely event of employee turnover, provision will be made for retaining a consultant to fulfill the requirements of the grant.

Kim Ellison, Grant Manager, will assist with financial reporting. She has been the Town's Grant Manager for 5 years, and prior to that was a book keeper for the Townshend, Vermont for four years. The Finance Director will also assist with financial reporting.

4.a.ii *Acquiring Additional Resources*

The BBP will procure qualified environmental consultants (QEPs) to assist with site assessment and cleanup planning tasks as described in this proposal. The Town has self-certified its procurement procedures for professional services and equipment in compliance with applicable federal regulation (pursuant to 49 CFR 18.36(g)(3)). A competitive solicitation process will be used. An Access Agreement has already been drawn up. If legal issues arise, the Town Attorney can provide legal assistance.

The Vermont Department of Health (DoH) is the lead agency for public health policy and advocacy. They operate 12 district offices throughout the state including one in our town. We will contact the District Manager to arrange for environmental health assistance related to reviewing risk assumption, assessments, and communicating risks. The District Manager can also arrange for joint press releases through DoH's Communications Office.

b Past Performance and Accomplishments

4.b.i *Currently Has or Previously Received an EPA Brownfields Grant*

(1) Accomplishments (3 pts)

Brattleboro currently has an open Brownfield Assessment Grant (BF-00A00112-0) that started October 1, 2015 and ends on September 30, 2019. The following have been accomplished with this grant and are reflected in ACRES:

- 8 properties have been assessed: 5 Phase I Environmental Site Assessments; 5 Phase II Environmental Site Assessment; 2 sites with the need for supplemental testing
- 1 site with an Archeological Resource Assessment to comply with Section 106
- 3 sites with Analysis of Brownfields Cleanup Alternatives/Corrective Action Plans

- 2 sites have been completed

Successes from the program include:

- Reformer Building (completed): The Reformer Building at 62 Black Mountain Road was a former newspaper print shop that has been redeveloped as a Police Station. The site entered Vermont's Brownfields liability program. All phases of assessment were coordinated with the Vermont Department of Environmental Conservation and US EPA. No contamination was found, and a Certificate of Completion was issued. The project created 20 jobs and leveraged \$4.1 million was leveraged for the project.
- 250 Birge Street (ongoing): This parcel is 12.0 acres of land in a floodplain that has historically been used for kiln drying activities. The soils are contaminated with PAHs. This reuse plan is floodplain restoration and passive recreation. Active community engagement efforts included partnering with Vermont Performance Lab and their artist in residence and the Hilltop Montessori School to explore the history of the site and plan for its future use. Over 100 community members came out to a community meeting to learn about the project and share their thoughts. Pending the award of a FEMA grant, cleanup should proceed in 2019.

(2) Compliance with Grant Requirements

Brattleboro's current Assessment Grant (BF-00A00112-0) was awarded in 2015 with a total of \$400,000 (\$200,000 in hazardous substance and \$200,000 for petroleum). Grant reporting has been timely and acceptable to the EPA. Results have been reporting on in ACRES in a timely manner. A one-year extension was granted in August 2018 and so the grant is open until September 2019.

To date, we have had a difficult time finding sites for the Petroleum program. When we wrote the grant, we anticipated being able to assess a site on the Connecticut River that the Town anticipated acquiring as part of a State of Vermont bridge project. The plans have changed for this property and even if, the Town acquires the property, it will not happen within the life of the Cooperative Agreement. In late Fall 2018, we conducted a petroleum inventory to help identify potential sites. The inventory results indicated that there were not a lot of viable sites that were transactional. There are only about two sites on the inventory that are transactional, one of which is not eligible for the program, so we do not expect a great demand on the funding between now and end of the grant period. As a result, in December 2019 the EPA granted our request to de-obligate \$125,000 in petroleum funds. We currently have \$48,457.70 remaining in petroleum funds. Our plan is to expend the funds by soliciting sites identified as potential petroleum brownfields in the Inventory.

There is \$68,030.43 remaining in hazardous substance funding. These remaining funds are committed to the following:

- Clean-up planning for 250 Birge Street
- Phase II Assessment at Long Falls Paper Board in Brattleboro
- Hazardous Building Material Assessment at 54 South Main Street, Brattleboro
- Oversight and EPA grant reporting

Attachment A

Letter from the State of Vermont



AGENCY OF NATURAL RESOURCES

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
(802) 249-5822
Patricia.coppolino@vermont.gov

January 10, 2019

Town of Brattleboro
Attn: Ms. Sue Fillion
230 Main Street, Suite 202
Brattleboro, VT 05301

Dear Ms. Fillion,

This letter will serve as acknowledgement that the Vermont Department of Environmental Conservation is aware that the Town of Brattleboro is intending to apply for Hazardous FY19 federal brownfield grant funds and to use the grant funds, if awarded, to conduct general site assessment activities.

The Vermont Department of Environmental Conservation is appreciative of your intent to support brownfield redevelopment in Vermont. Please know that the Vermont Department of Environmental Conservation is here to support your organization with brownfield redevelopment in Brattleboro, Vermont.

Good luck in the competition.

Sincerely,

Patricia Coppolino, Environmental Program Manager
Sites Management Section
Waste Management and Prevention Division



Attachment B

Threshold Criteria

1. Applicant Eligibility

Brattleboro is a General Purpose Unit of Local Government, a municipality formed in the State of Vermont.

2. Community Involvement

The community outreach plan will engage a broad base, provide updated project information to facilitate public dialogue, and provide opportunities for public participation. The following methods will be used to involve and inform the community and stakeholders:

- Steering Committee: The Brattleboro Planning Commission (PC) will serve as a steering committee for the grant and will be tasked with accepting sites into the program. The PC is a seven-member volunteer board appointed by the Selectboard. The PC is currently comprised of a broad range of citizens including a certified planner, artist, and small business owner. Other roles for the Steering Committee will include: identify stakeholder and groups for participation, serve as liaisons to the community, and participate in reuse visioning when necessary.
- Community Visioning: We will engage the community in reuse visioning with sites that need additional work. We will intentionally target community members to participate with this project so that they can benefit from the decisions that will shape their neighborhood. We will identify a wide range of stakeholders with interests in community health and wellness, affordable housing, economic development, and neighborhood improvement to protect a wide variety of interests.
- Public Meetings: Public meetings will be held at key points during the assessment process. These meetings will be held at locations and times convenient to the community and will allow for a direct exchange of information between interested citizens, project staff, and environmental professionals.

We will use a combination of newspapers, television, print materials, and social media to communicate our progress. All community input will be documented to maintain continuity in project decision-making. Information documents related to project activities will be accessible to the public during Town Office business hours. The Town will maintain a copy of all reports in both digital and hard copy. All minutes of meetings where brownfields are discussed will be available to the public and posted on the Town's website. Community participation activities will also be documented.

3. Expenditure of Assessment Grant Funds

Brattleboro currently has open Cooperative Agreement BF-00A001112. We have expended a total of \$158,511.87. Attachment C includes the General Ledger documenting these draw downs.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

01/31/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Brattleboro, Town of

* b. Employer/Taxpayer Identification Number (EIN/TIN):

03-60000393

* c. Organizational DUNS:

0739951690000

d. Address:

* Street1:

230 Main Street, Suite 208

Street2:

* City:

BRATTLEBORO

County/Parish:

Vermont

* State:

VT: Vermont

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

05301-2875

e. Organizational Unit:

Department Name:

Planning Services Department

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

Susan

Middle Name:

D.

* Last Name:

Fillion

Suffix:

Title:

Planning Director

Organizational Affiliation:

Town of Brattleboro VT

* Telephone Number:

802-251-8112

Fax Number:

802-254-6456

* Email:

sfillion@brattleboro.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-06

* Title:

FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Town of Brattleboro's Brownfields Assessment Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant VT-001

* b. Program/Project VT-001

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2019

* b. End Date: 09/30/2022

18. Estimated Funding (\$):

* a. Federal	200,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	200,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms. * First Name: Susan

Middle Name: D.

* Last Name: Fillion

Suffix:

* Title: Planning Director

* Telephone Number: 802-251-8112 Fax Number:

* Email: sfillion@brattleboro.org

* Signature of Authorized Representative: Patrick M Moreland * Date Signed: 01/31/2019